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April 8, 2004

Administrator  
U.S. EPA  
P.O. Box 1473  
Merrifield, VA 22116

ATTN: Update High Production Volume (HPV) Chemicals Initiative

**RE: Volunteering for additional chemical for Registration Number**

Dear Administrator:

In addition to Schenectady International Inc.'s (SII) current list of seventeen (17) alkylphenols, SII will volunteer for CAS number 99-71-8; 4-(1-methylpropyl)-phenol. For reference, our original submission was dated April 13, 2001, followed by a re-submittal in response to EPA comments on April 1, 2002.

SII will compile a Robust Summary and Test Plan for CAS number 99-71-8 and submit it for inclusion in our mono-substituted para-alkylphenols category.

At this time, I also offer a clarification on another CAS number that is associated with SII. CAS number 27193-28-8 (1,1,3,3-tetramethylbutyl-phenol) was used by SII on the 1998 IUR. We now use CAS number 140-66-9 (para-tertiary octylphenol). CAS number 140-66-9 specifies the para position and CAS number 27193-28-8 does not specify the position of the octyl group. SII's product has not changed; we are just using the more specific CAS number. Our earlier HPV submission includes CAS number 140-66-9 and we have no plans to volunteer for CAS number 27193-28-8 as we do not manufacture it.

If you require additional information from SII at this time, please contact me at the address shown below, by telephone at 518-347-4512, or via e-mail at [dawn.hynes@siigroup.com](mailto:dawn.hynes@siigroup.com).

Very Truly Yours,

Dawn E. Hynes  
Manager, Corporate Toxicology and Regulatory Affairs

Cc: Charles Auer, Chemical Control Division, EPA  
Richard Heffer, High Production Volumes Chemical Branch, EPA  
David Williams, Chemical Control Division, EPA  
James Keith, American Chemistry Council, via e-mail